

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

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**PAMELA MOSES,**

**Plaintiff,**

**vs.**

**Civil Action No. 2:12-CV-02822-JPM-dkv**

**JURY TRIAL DEMANDED**

**YOUTUBE INC, YOUTUBE LLC,  
GOOGLE INC, and  
SHIRA KRASNOW**

**Defendants.**

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**DEFENDANT SHIRA KRASNOW'S RULE 12(b)(2) MOTION TO DISMISS  
PLAINTIFF'S AMENDED COMPLAINT**

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Comes now, Defendant, Shira Krasnow, by and through counsel, and moves the Court to dismiss Plaintiff's Amended Complaint pursuant to Federal Rule of Civil Procedure 12(b)(2). Plaintiff's Amended Complaint fails to state a proper basis for which personal jurisdiction can be asserted over Defendant Krasnow.

Currently, Defendant Krasnow's original Motion to Dismiss (ECF No. 16) and Motion for Reconsideration (ECF No. 47) are still pending before this Court. While Defendant Krasnow remains confident in her original Motion to Dismiss and her Response in Opposition to Plaintiff's Motion to Amend, Defendant Krasnow now files this Motion to Dismiss Plaintiff's Amended Complaint as a safeguard while the Court deliberates on Defendant's original Motion to Dismiss and her Motion for Reconsideration.

In further support of this Motion, the Defendant relies upon her Affidavit and Memorandum of Law, filed contemporaneously herewith, and the entire record in this case.

Respectfully submitted,

RAINEY, KIZER, REVIERE & BELL, PLC

By:           s/Russell E. Reviere            
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**CERTIFICATE OF SERVICE**

I hereby certify that on this the 28<sup>th</sup> day of February, 2013, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing report. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

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